

IN THE COMMON PLEAS COURT OF FRANKLIN COUNTY, OHIO

REGINA TINNES  
635 E. Jenkins Avenue  
Columbus, Ohio 43207

Plaintiff,

v.

STATE FARM MUTUAL  
AUTOMOBILE  
INSURANCE COMPANY  
One State Farm Plaza  
Bloomington, Illinois, 61710-0001

and

PEYTON A. NOLAND  
1591 Demorest Road  
Columbus, Ohio 43228

Defendants.

Case No. \_\_\_\_\_

Category C

Judge \_\_\_\_\_

**COMPLAINT**

**(Jury Demand Endorsed Hereon)**

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**(Jury Demand Endorsed Hereon)**

1. On March 27, 2024, Plaintiff REGINA TINNES was carefully operating a motor vehicle traveling westbound, on Greenlawn Avenue, in Franklin County, Ohio, when the Defendant PEYTON A. NOLAND attempted to turn onto the on-ramp leading to Interstate-71, and failed to yield to Plaintiff REGINA TINNES whom had the right-of-way.

2. As a direct and proximate result of the negligent conduct of Defendant PEYTON A. NOLAND, the Plaintiff REGINA TINNES sustained multiple, indivisible injuries to her

body, which injuries are permanent and have caused, and will cause in the future, pain, suffering, mental anguish, and permanent disability, thereby depriving her of a normal way of life.

3. As a direct and proximate result of the negligent conduct of Defendant PEYTON A. NOLAND, the Plaintiff REGINA TINNES has incurred reasonable and necessary medical, hospital, and related expenses, and, due to the permanent nature of her injuries, expects to incur further such expenses in the future.

4. As a direct and proximate result of the negligent conduct of Defendant PEYTON A. NOLAND, the Plaintiff REGINA TINNES has lost wages and, due to the permanent nature of her injuries, expects to lose further such wages in the future, and her earning capacity has been impaired.

5. As a direct and proximate result of the negligent conduct of the Defendant PEYTON A. NOLAND, the personal property of the Plaintiff REGINA TINNES was damaged or destroyed.

6. The Plaintiff REGINA TINNES, at all relevant times hereto, was insured under policies of insurance issued by the Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, which policies provided Medical Payments Coverage, Uninsured Motorist Coverage, and Underinsured Motorist Coverage.

7. The Defendant PEYTON A. NOLAND was the owner and/or operator of an uninsured or underinsured motor vehicle, and the Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY is in breach of its contractual obligation to pay the damages its insured incurred as the result of the negligence of the owner and/or operator of an uninsured or underinsured motor vehicle, such as the damages sustained by the Plaintiff REGINA TINNES herein as a result of the conduct of the Defendant PEYTON A. NOLAND.

8. The Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY has made payments to or on behalf of the Plaintiff REGINA TINNES under the Medical Payments Coverage and may claim subrogation rights as to any such payments, which rights are disputed by the Plaintiff REGINA TINNES.

**WHEREFORE**, REGINA TINNES demands judgment in her favor against the Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY for compensatory damages in excess of Twenty-Five Thousand Dollars (\$25,000.00), plus pre-judgment and post-judgment interest, and her attorney fees and costs herein.

**WHEREFORE**, Plaintiff REGINA TINNES demands judgment in her favor against the Defendant PEYTON A. NOLAND for compensatory damages in excess of Twenty-Five Thousand Dollars (\$25,000.00), plus pre-judgment and post-judgment interest, and her attorney fees and costs herein.

/s/ Corey M. Scott

Corey M. Scott (0101791)  
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*Attorney for Plaintiff*

**JURY DEMAND**

Plaintiff respectfully demands a trial by a jury of eight (8) persons as to all issues contained herein.

/s/ Corey M. Scott

Corey M. Scott (0101791)  
*Attorney for Plaintiff*